

Michael J. Canning, Esq. (MJC3060)
GIORDANO, HALLERAN & CIESLA, P.C.
125 Half Mile Road, Suite 300
Red Bank, N.J. 07701-6777
(732) 741-3900
Attorneys for Defendant, Cohen, Weiss and Simon LLP

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY,

Plaintiff,

v.

CHRISTIAN EXOO a/k/a ANTIFASH
GORDON; ST. LAWRENCE UNIVERSITY;
TRIBUNE PUBLISHING COMPANY;
NEW YORK DAILY NEWS; VIJAY
GADDE; TWITTER, INC.; COHEN, WEISS
AND SIMON LLP,

Defendants.

Case No. 2:20-cv-12880-JMV-JAD

Civil Action

**COHEN, WEISS AND SIMON LLP'S
NOTICE OF MOTION TO DISMISS
COUNT XIII OF PLAINTIFF'S
COMPLAINT**

MOTION DATE: DECEMBER 7, 2020

PLEASE TAKE NOTICE that Giordano, Halleran & Ciesla, P.C., counsel for Defendant, Cohen, Weiss and Simon LLP ("CWS"), shall move before the United States District Court for the District of New Jersey, located at Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey, on December 7, 2020 at 9:00 a.m. or as soon thereafter as counsel may be heard, for the entry of an Order dismissing Count XIII of the Plaintiff, Daniel D'Ambly's Complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(c).

PLEASE TAKE FURTHER NOTICE that in support of the application, CWS shall rely upon the Certification of Michael J. Canning, Esq. and Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

GIORDANO, HALLERAN & CIESLA, P.C.
Attorneys for Defendant, Cohen,
Weiss and Simon LLP

By: 

Michael J. Canning, Esq.

Dated: November 9, 2020

Docs #4702889-v1